

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

Marc Jon Manchon,

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Plaintiff,

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v.

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Docket No. 1:24-cv-00347-LM-AJ

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Charlestown, NH Police Dept., et al.

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Defendants.

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MOTION FOR SUMMARY JUDGMENT

Defendants, Town of Charlestown, NH Police Department, Chief Patrick Connors, and Dispatcher Sirena Relihan (collectively, the “Charlestown Defendants”) file this motion for summary judgment and state as follows:

1. This case arises out of an October 27, 2021 arrest of Plaintiff at the Charlestown PD for obstructing government administration and disorderly conduct. In his operative complaint, Plaintiff has sued Dispatcher Relihan, Chief Connors, and Charlestown PD, claiming they violated Plaintiff’s rights under the First Amendment and Fourth Amendment. See (ECF Doc. 12.)

2. Based on the record evidence before the Court, the Charlestown Defendants are entitled to summary judgment because (1) no rational trier of fact could conclude that Chief Connors and Dispatcher Relihan violated Plaintiff’s constitutional rights; (2) Chief Connors and Dispatcher Relihan are entitled to qualified immunity; (3) Charlestown PD is entitled to summary judgment because it is an improper party; and (4) Plaintiff’s claim against Charlestown PD and Chief Connors, in his official capacity, fail as a matter of law.

3. Charlestown Defendants incorporate, by reference, a contemporaneously filed memorandum of law in support of their motion for summary judgment in addition to declarations and exhibits. See Local Rule 7.1(a)(2). As more fully articulated in Charlestown Defendants' memorandum of law, Charlestown Defendants are entitled to summary judgment.

4. Due to the dispositive nature of this motion, Plaintiff's concurrence was not sought. See Local Rule 7.1(c).

WHEREFORE Defendants Town of Charlestown, NH Police Department, Chief Patrick Connors, and Dispatcher Sirena Relihan respectfully request that this Court:

- A. Grant their motion for summary judgment; and
- B. Grant such further relief that is just.

Respectfully submitted,

**TOWN OF CHARLESTOWN, NH POLICE DEPARTMENT,
PATRICK CONNORS AND SIRENA RELIHAN**

By Their Attorneys,

GALLAGHER, CALLAHAN & GARTRELL, P.C.

Dated: May 19, 2025

By: /s/ Matthew V. Burrows
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CERTIFICATE OF SERVICE

I certify that a copy of this filing was served this date via the Court's electronic filing system upon Plaintiff.

Dated: May 19, 2025

By: /s/ Matthew V. Burrows
Matthew V. Burrows, Esq.